UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

ERNESTINA GARCIA

VS C.A. NO.: 13-617

HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR HOME EQUITY LOAN TRUST SERIES ACE 2006-HE1, ALIAS, ET AL

STIPULATION TO EXTEND TIME FOR PLAINTIFF TO ANSWER DEFENDANT'S MOTION TO DISMISS

Plaintiff, by her Attorney and Defendants, by their Attorney, agree to move to extend the time in which Plaintiff may respond to the Motion to Dismiss to March 24, 2016. Due to recent circumstances additional time is needed for the response. Defendants have assented to this extension based on Plaintiff's agreement that she will not seek any additional extensions of time in which to oppose Defendants' Motion to Dismiss.

ERNESTINA GARCIA By her Attorney

/s/ John B. Ennis

March 8, 2016

JOHN B. ENNIS, ESQ. #2135 1200 Reservoir Avenue Cranston, Rhode Island 02920 (401) 943-9230 jbelaw@aol.com HSBC BANK USA, NATIONAL
ASSOCIATION, AS TRUSTEE FOR
HOME EQUITY LOAN TRUST
SERIES ACE 2006-HE1, HSBC
BANK USA, NATIONAL
ASSOCIATION, AS TRUSTEE FOR
ACE SECURITIES CORP. HOME
EQUITY LOAN TRUST, SERIES
2006-HE1, ASSET BACKED PASSTHROUGH CERTIFICATES,
ALIAS, WELLS FARGO BANK,
N.A.
By its Attorney

March 8, 2016

/s/ Lauren J. O'Connor

LAUREN J. O'CONNOR, ESQ. Seyfarth Shaw, LLP World Trade Center East Two Seaport Lane Suite 300 Boston, MA 02210-4800 (617) 946-4924 loconnor@seyfarth.com

CERTIFICATE OF SERVICE

I hereby certify that I emailed a copy of the above Stipulation to the following on this 8th day of March, 2016.

Lauren J. O'Connor, Esq. Seyfarth Shaw, LLP World Trade Center East Two Seaport Lane Suite 300 Boston, MA 02210-4800

> /s/John B. Ennis JOHN B. ENNIS, ESQ.